1 2 3 4 5 6 7 8	DAVID H. BECKER, ESQ. (Pro Hac Vice) Oregon Bar No. 081507 Law Office of David H. Becker, LLC 917 SW Oak St., Suite 409 Portland, Oregon 97205 (503) 388-9160 davebeckerlaw@gmail.com DAVID A. BAHR, ESQ. (Pro Hac Vice) Oregon Bar No. 90199 Bahr Law Offices, P.C. 1035 1/2 Monroe St. Eugene, Oregon 97402 (541) 556-6439 davebahr@mindspring.com	DANIEL G. BOGDEN United States Attorney District of Nevada TROY K. FLAKE Assistant United States Attorney U.S. Attorney's Office 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 Telephone: 702-388-6336 Facsimile: 702-388-6787 Email: troy.flake@usdoj.gov Attorneys for the Federal Defendants
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14 15	UNITED STATES DISTRICT COURT	
16	DISTRICT OF NEVADA	
17	BASIN AND RANGE WATCH,)
		Civil Action No.: 2:16-cv-00403 JCM-PAL
18	Plaintiff,))
19	v.))
20	BUREAU OF LAND MANAGEMENT AND THE U.S. DEPARTMENT OF THE	STIPULATION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO REOPEN
21	INTERIOR,) <u>DISCOVERY</u>) <u>(SECOND REQUEST)</u>
22	Defendants.))
23		,
24	Plaintiff Basin and Rage Watch and Defendants Bureau of Land Management and U.S.	
25	Department of the Interior filed a Motion to Reopen Discovery (ECF# 32) on December 9, 2016 . On	
26	December 15, 2016 , the Court granted the parties'	first request for extension of the briefing deadlines
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(ECF #35). The current deadlines call for the United States' response on January 9, 2017, and 1 Plaintiff's reply on **January 23, 2017**. 2 The parties have engaged in substantive discussions to resolve the matters at issue in the Motion 3 to Reopen Discovery. Both parties are hopeful that they will be able to reach an agreement that will obviate the need for further briefing on this Motion. Accordingly, the parties request that the Court 5 permit them to modify the briefing schedule as follows: 6 **January 23, 2017** – United States Opposition to the Motion to Reopen Discovery 7 February 8, 2017 – Plaintiff's Reply in Support of Motion to Reopen Discovery 8 The extension requested is not for purposes of delay and is sought in good faith. This will give 9 the parties sufficient time to work toward a resolution of the matters at issue in this motion, including 10 obtaining client approval and crafting an appropriate stipulation. In the event that the parties are unable 11 to resolve the issue without going forward on the Motion, this schedule will allow them to fully brief the 12 issues and file their responses. 13 Respectfully submitted this 9th day of January 2017. 14 15 DANIEL G. BOGDEN **United States Attorney** 16 17 /s/ David H. Becker /s/ Troy K. Flake David H. Becker, Esq., Pro Hac Vice Troy K. Flake 18 Of Attorneys for Plaintiff Assistant United States Attorney Of Attorneys for Federal Defendants 19 It is so ordered. 20 Date: January 10, 2017 21 United States Magistrate Judge 22 23 24 25 26